

SC NAACP v. Alexander,
D.S.C. Case No. 3:21-cv-03302-MGL-TJH-RMG

Exhibit 6

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF SOUTH CAROLINA
3 COLUMBIA DIVISION
4

5 THE SOUTH CAROLINA STATE CONFERENCE OF
6 THE NAACP, et al.,

7 Plaintiffs,

CASE NO.

vs.

3:21-CV-03302-MBS-TJH-RMG

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9 THOMAS C. ALEXANDER, et al.,
10 Defendants.

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13 VIDEO TELECONFERENCE

14 DEPOSITION OF: REPRESENTATIVE THOMAS HAUGER

15 DATE: June 28, 2022

16 TIME: 9:40 a.m.

17 LOCATION: Virtual - Zoom

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19 TAKEN BY: Counsel for the Plaintiffs

20 REPORTED BY: Roxanne Easterwood, RPR
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1 same racial identity.

2 Q. Do you have any understanding why that
3 might be?

4 A. In general, I think it's a comfort
5 level. People -- in basic terms of geography,
6 things that are more alike tend to cluster
7 together, where things that are different tend to
8 be a little more further apart.

9 Q. Any understanding on why there might
10 be racial group clustering in South Carolina?

11 A. Well, we've got people of many
12 different races here. So, I mean, there's going
13 to be some clustering in general, and not just
14 around ethnic racial lines, but ethnic lines as
15 well.

16 Q. Do you have any understanding of any
17 historical reasons why that might be in South
18 Carolina for racial group clustering?

19 A. Yes. I've read history books. Even
20 though I didn't grow up in South Carolina, I've
21 read some of the history books of South Carolina,
22 and I know about some of the injustices of the
23 past and things such as that within the state.

24 Q. What are some of those that you're
25 thinking of?

1 A. Thinking about things such as slave
2 trade, things such as that, and then also reading
3 about Benjamin Tillman and some of the -- you
4 know, he was kind of the 19th century version of
5 Donald Trump here in South Carolina, so. So
6 reading just history, yeah.

7 Q. Did any of that history inform any of
8 the work around Congressional redistricting?

9 A. Absolutely not.

10 Q. Did you think it should?

11 A. I think it would be good to take that
12 into consideration, just some racial -- you know,
13 racial conditions. I think that is something that
14 is actually good to take into consideration.

15 Q. Why is that?

16 A. So people can be represented properly.

17 Q. Do you have any concerns if that's not
18 taken into account that people might not be
19 represented equally?

20 A. I think that could potentially happen.
21 We've talked about cracking or packing. I think
22 both of those are -- can be legitimately done, and
23 those are not a good thing.

24 Q. I know last time we talked about your
25 work in 2010 in South Carolina. Do you recall or

1 make sure people are being represented as they
2 wish and as they need to be.

3 Q. Did you at all suggest to do a
4 district-by-district analysis at any point to the
5 ad hoc committee?

6 A. No.

7 Q. Were you aware of any request for
8 discussions to do so?

9 A. No.

10 Q. I think we have answered this before,
11 and maybe this -- the easier way is to ask it now.
12 Was there any, to your knowledge, RPV analysis at
13 all conducted for any map that you worked on
14 during the Congressional redistricting cycle?

15 A. To my knowledge, no.

16 Q. Were there any discussions about this
17 proposal about increasing, decreasing, or
18 maintaining the black voting age population in
19 certain districts?

20 A. To my knowledge, no.

21 Q. Any discussions about how districts
22 would perform for black-preferred candidates?

23 A. To my knowledge, no.

24 Q. How would you describe the role that
25 race played in the development of this initial